UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

April 13, 2004

Lonnie Monaco (monacolj@efane.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Quality Assurance Project Plans for Sites 1,3, 2, & 9, dated March 2004 for the Naval Air Station Brunswick, Maine

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject documents and comments are below:

GENERAL COMMENTS

1. Since the laboratory has not been chosen, information specific to the laboratory is not included in the above Plans. This information will need to be added once the laboratory has been selected.

2. Vinyl chloride's aqueous Project Quantitation Limit is listed as 1 ug/L with the analysis being performed using Method 8260B modified for Selected Ion Mass (SIM). For this analysis, the water samples are not preserved with HCl and have a holding time of 7 days. Also, since vinyl chloride samples will be analyzed differently than the other VOCs samples, the vinyl chloride samples will need its own set of quality control samples (e.g., field duplicates/replicates, blanks, etc.). This information needs to be added to the appropriate places in the above Plans.

3. The above Plans are not consistent with the following field monitoring parameters oxidation reduction potential (ORP) and Eh. The Plans (Site 1 - Orion Street landfill - North & Site 3 - Hazardous Waste Burial Area & Site 9 - Neptune Drive Disposal Area) list ORP as a field parameter along with pH, temperature, conductivity, turbidity, and dissolved oxygen. Whereas, the Plan (Long-Term Monitoring Plan Sites 1 and 3 and Eastern Plume) list Eh as a field parameter along with pH, temperature, conductivity, turbidity, and dissolved oxygen. Please explain. Note ORP and Eh are not the same. Most field instruments/equipment only measures ORP.

4. It is unclear in the tables in the above Plans whether the sediment Project Quantitation Limits are based on dry weight or wet weight. They should be based on dry weight. Please clarify.

SPECIFIC COMMENTS

Site 1 - Orion Street Landfill - North & Site 3 - Hazardous Waste Burial Area

1. Page 2-1 of 2-4, Section 2.1 Site Description and Background

This Section lists dichlorodiphenyltrichloroethane as a contaminant of concern. However, Tables 5-2-S1/3, 5-2-EP, and 7-3-S1/3 do not list this contaminant. Please explain.

2. Table 8-1-EP Analytical Program Summary

The Table lists for the ground water samples that these samples will be analyzed using Methods 8260B and 8260B SIM. Each of these methods requires their own quality control (QC) samples (e.g., field duplicates/replicates, blanks, etc.). For the sample collection procedure that uses passive diffusion bags, it is unclear whether the bags will hold enough volume to fill all the sample vials necessary for the analysis of vinyl chloride and VOCs. Please clarify.

Site 2 - Orion Street Landfill - South

1. Page 2-1 of 2-2, Section 2.1 Site Description and Background

This Section lists 4,4'-dichlorodiphenyltrichloroethane and 4,4'-dichlorodiphenyl-dichloroethylene as contaminants of concern. Table 7-2-S2 (Sediment Organochloride Pesticides) lists these contaminants along with 4,4'-dichlorodiphenyldichloroethane. However, Table 7-3-S2 (Pesticides) does not list these contaminants. Please explain.

2. Table 7-2-S2 Sediment Target Analyte List Metals

The following Project Quantitation Limits are missing from the Table, Potassium, Selenium, Silver, Sodium, Thallium, Vanadium, and Zinc. Please add the information to the Table.

Site 9 - Neptune Drive Disposal Area

1. Page 7-2 of 7-3, Section 7.3 Measurement Performance Criteria

The Section states that surface water, sediment, leachate seep samples and passive diffusion samples from monitoring wells will be collected. The second sentence in the paragraph states "for field duplicate sample, the relative percent difference will need to be no more than 30 percent for ground water samples". If this criterion is to be applied to the passive diffusion samples (they are collected as replicates), then change the sentence to "for field duplicate/replicate sample, the relative percent difference will need to be no more than 30 percent for ground water samples". If a different criterion is to apply for the passive diffusion samplers then add this criterion to the Section. Also, add the criteria for the surface water, sediment, and leachate seep samples to the Section.

2. Table 9-1-S9 Summary of Sample Locations, and Sampling and Analysis Methods . . .

Add a new column for the Parameter Vinyl Chloride by Method 8260B SIM since its requirements are different from VOCs. The Preservation Requirement is "Cool to 4°C" and the Maximum Holding Time is " 7 Days". Note the vinyl chloride samples will need to have its own set of quality control samples (e.g., duplicates/replicates, MS, MSD, etc.).

3. Table 9-1-S9 Summary of Sample Locations, and Sampling and Analysis Methods . . .

For the Location/Well ID No. "SED-010" change the Analytical Parameter from "TCL volatile organic compound (25 ml purge, detection limit < 1 ug/L) 8260B" to "TCL volatile organic compound Method 5035A/8260B". In the column Containers change "15 g glass jar per sample" to "VOC vials, glass jar for percent solids sample".

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
Ed Benedikt/Brunswick Conservation Commission e-mail only (rbenedik@gwi.net)
Tom Fusco/BACSE e-mail only (tfusco@gwi.net)
Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Charles Porfert/EPA e-mail only (porfert.charlie@epa.gov)
Peter Golonka/Gannet-Fleming e-mail only (pgolonka@gfnet.com)
Darren Gainer/ECC email only (dgainer@ecc.net)
Al Easterday/EA (aeasterd@eaest.com)
Tony Williams/NASB (WilliamsA@nasb.navy.mil)